IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

YURI GARMASHOV,

Plaintiff,

New York State

v.

Civil Action Case No.: 1:21-cv-04917-JGK

PARACHUTE UNITED **STATES** ASSOCIATION, INC.,

Defendant.

NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the accompanying Affirmation in Support dated May 19, 2022, and all exhibits thereto, along with all prior proceedings herein, Plaintiff, YURI GARMASHOV, will move this Court before the United State District Court, Judge John G. Koeltl, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and time to be set by the Court, pursuant to Fed. R. Civ. P. 12(b)(1) for an Order Enforcing the Settlement Agreement reached at Mediation and for attorneys fees, together with such other and further relief as this Court deems just and proper.

Dated: May 20, 2022

New York, New York

Yours, etc.,

HALL BOOTH SMITH, P.C.

By:

Alex Kaufman

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5th Floor

New York, NY 10017

(212) 805-3630

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Attorneys for Plaintiff

To: All Counsel of Records Via CM/ECF

Winget, Spadafora & Schwartzberg, LLP 45 Broadway, 32nd Floor New York, New York 10006 (212) 221-6900 Kenneth McLellan mclellan.k@wssllp.com and Keith Roussel Roussel.k@wssllp.com

CERTIFICATION OF SERVICE

Alex Kaufman, an attorney admitted to practice in the Courts of the State of New York,

hereby certifies as follows:

I am an attorney licensed to practice in the State of New York and licensed to practice

before this Court. I am a partner at the law firm of Hall Booth Smith, P.C. I am over eighteen

years of age. I am not a party to this action.

On May 20, 2022, I caused a copy (1) Notice of Motion, and (2) Memorandum of Law in

Support of Motion to Enforce Settlement Agreement and Attorneys Fees, to be served on the

following party, via ECF/PACER, which was provided to the Court and is currently reflected on

the docket:

Winget, Spadafora & Schwartzberg, LLP

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New York, New York 10006

(212) 221-6900

Kenneth McLellan mclellan.k@wssllp.com

and Keith Roussel Roussel.k@wssllp.com

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 20, 2022

New York, New York

By:

Alex Kaufman (5362264)

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